

**IN THE  
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND**

JANE DOE,

*Plaintiff,*

v.

OFFICE OF THE PUBLIC  
DEFENDER, ET AL.,

*Defendants.*

\*

\*

\*

No.

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**NOTICE OF REMOVAL**

Defendant, Office of the Public Defender, by its undersigned counsel, pursuant to Title 28 U.S.C. §§ 1441 and 1446, and Local Rule 103.5 of the United States District Court for the District of Maryland, hereby removes this action from the Circuit Court for Montgomery County, Maryland to the United States District Court for the District of Maryland, and, for reasons, states:

1. The Complaint governing this action was filed in the Circuit Court for Montgomery County on January 21, 2025.
2. The Complaint, brought under the auspices of State and Federal law, sets forth causes of action for Violation of Fourteenth Amendment Rights (42 U.S.C. § 1983) (Count I); Affirmative Injunctive Preliminary and Permanent Injunctive Relief (Count II); Writ of Mandamus (Count III); Violation of Maryland Declaration of Rights (Article 24) (Count IV); Defamation (Count V)..

3. Because Count I alleges a cause of action against Defendant Office of the Public Defender under a federal statute and/or the federal Constitution, the United States District Court has original jurisdiction over that count in that it purports to state a claim arising “under the Constitution, laws, or treaties of the United States.” 28 U.S.C. § 1331.
4. In addition, pursuant to 28 U.S.C. § 1367, the United States District Court, in its discretion, may exercise supplemental jurisdiction over the state law causes of action in the Complaint, Counts II-V.
5. Writs of summons were issued for Defendants on January 23, 2025.
6. Defendant Office of the Public Defender was served on February 3, 2025.
7. Thus, Defendant Office of the Public Defender is filing this Notice of Removal “within thirty (30) days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based...” 28 U.S.C. § 1446(b).
8. Pursuant to Local Rule 103.5, Defendant Office of the Public Defender is filing with this Notice of Removal in the United States District court true and legible copies of all process, pleadings, papers and orders which have been served upon him. Exhibit 1.
9. Concurrent with the filing of this Notice of Removal, Defendant Office of the Public Defender Attorney for Baltimore City, pursuant to 28 U.S.C. § 1446(c)(5) has provided written notice of removal to Plaintiff and the other

named defendants (through counsel) and has filed a copy of this Notice with the Clerk of the Circuit Court for Baltimore City, thereby effecting the removal of this action, and alerting the State court that it shall proceed no further unless and until the case is remanded. *See* Exhibit 2.

10. Defendant, Natasha Dartigue, is the only other Defendant who is known to have been served, has consented to the removal of this action.

Wherefore, the Defendant notifies all Courts and Parties that this action has been removed to the United States District Court for the District of Maryland and that no further proceedings shall be had in the Circuit Court for Montgomery County.

Respectfully submitted,

ANTHONY G. BROWN  
Attorney General of Maryland

/s/ Wendy L. Shiff

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March 4, 2025

*Attorneys for Office of the Public  
Defender*

**CERTIFICATE OF SERVICE**

I certify that, on this 21st day of October 2024 the foregoing was served by CM/ECF  
on all registered CMF users and by email and first-class mail on the following:

Jason Kisner, Counsel for Plaintiff  
8401 Corporate Drive, Suite 650  
Hyattsville, MD 20785

James Corley, Counsel for Baltimore City Police Department  
100 N. Holiday Street, Suite 101  
Baltimore, Maryland 21202

/s/ Wendy L. Shiff

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Wendy L. Shiff